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Attorneys for Defendant PeopleConnect, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MEREDITH CALLAHAN AND LAWRENCE
GEOFFREY ABRAHAM, on behalf of themselves
and all others similarly situated,

Plaintiffs.

v.

PEOPLECONNECT, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-09203-EMC

**DECLARATION OF CLINT SMITH IN
SUPPORT OF DEFENDANT'S MOTION TO
DISMISS PURSUANT TO FED. R. CIV. P. 12
AND MOTION TO STRIKE PURSUANT TO
CALIFORNIA CODE OF CIVIL
PROCEDURE § 425.16**

1 I, Clint Smith, hereby declare:

2 1. I am currently Director, Strategic Partnerships at PeopleConnect, Inc., which owns and operates
3 Classmates.com. As the Director, Strategic Partnerships at PeopleConnect, Inc., I am the prime point of
4 contact and negotiation lead for any yearbook licensing contracts and amendments. I also manage the
5 yearbook scanning vendor relationship and the Classmates.com Business Analytics and
6 Budgeting/Forecasting teams.

7 2. I have reviewed the records associated with PeopleConnect, Inc.'s licensing agreement with
8 Ancestry.com and was personally involved in their negotiation.

9 3. Classmates.com provides a yearbook database to Ancestry.com.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
11 correct and that I executed this declaration on July 26, 2021 in Seattle, Washington.

12 DocuSigned by:
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14 Clint Smith
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